

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:
*Nabil Hanna v. Aurobindo Pharma USA,
Inc. and Aurolife Pharma LLC, et al.*

NOTICE OF VIDEOTAPED DEPOSITION OF
MARY HANNA

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC will take the deposition upon oral examination of Mary Hanna on July 20, 2021 at 11:00 a.m. EST at 7966 Windridge Dr., Broadview Hts., OH 44147. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

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Date: June 14, 2021

Respectfully submitted,

/s/Jill H. Fertel
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*Attorney for Defendants
Aurobindo Pharma USA, Inc.,
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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of June, 2021, a true and correct copy of the Notice of Videotaped Deposition of Mary Hanna was served upon the following by e-mail and ECF, with copies to Counsel for Plaintiff and all counsel of record by ECF:

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